

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

NATASHA C., a minor, individually, and	:	CIVIL ACTION
by her father, GERALD C., individually	:	
	:	
vs.	:	
	:	
VISIONQUEST, LTD.,	:	
VISIONQUEST NATIONAL, LTD,	:	
VISIONQUEST LODGEMAKERS, INC.,	:	
VISIONQUEST NONPROFIT	:	
CORPORATION, and	:	
DARRELL STEACH, an individual and in	:	
his official capacity	:	
of an employee of VisionQuest	:	
	:	
		NO. 03-1903

RULE 68 OFFER OF JUDGMENT

TO: Plaintiff: Natasha C.

and

TO: Samuel H. Clark, Esquire
HOLSINGER, CLARK & ARMSTRONG, P.C.
832 Philadelphia Street
Indiana, PA 15701
and

Kelly B. Stapleton, Esquire
STAPLETON & STAPLETON
832 Philadelphia Street
Indiana, PA 15701
Attorneys for Plaintiff

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants, Visionquest,
Ltd., Visionquest National, Ltd, Visionquest Lodgemakers, Inc., and Visionquest Nonprofit
Corporation, hereby offer to allow judgment to be taken against them by Plaintiff, Natasha C.
on all counts of the Complaint, in the lump sum of \$100,000.00 (One Hundred Thousand

Dollars) which includes all costs and fees. The plaintiff shall not recover any attorney's fees or costs separate from this offer. This offer of a money judgment is a settlement offer of this action only and said judgment herein to have no effect whatsoever except in settlement of this case.

This offer is made pursuant to the provisions of Rule 68 of the Federal Rules of Civil Procedure and will be deemed withdrawn unless you serve a written notice of acceptance of the offer within 10 days of the date that it was served on you.

Dated: June 28, 2004

MARGOLIS EDELSTEIN

By: JH1077

Jonathan D. Herbst
Attorneys for Defendants,
VISIONQUEST, LTD.,
VISIONQUEST NATIONAL, LTD,
VISIONQUEST LODGEMAKERS, INC.,
VISIONQUEST NONPROFIT
CORPORATION,
Attorney I.D. No. 09415
The Curtis Center, 4th Floor
Independence Square West
Philadelphia, PA 19106
(215) 922-1100

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Offer of Judgment was served upon the following parties by facsimile, regular mail and certified mail, return receipt requested, on June 28, 2004:

Samuel H. Clark, Esquire
HOLSINGER, CLARK & ARMSTRONG, P.C.
832 Philadelphia Street
Indiana, PA 15701

Kelly B. Stapleton, Esquire
STAPLETON & STAPLETON
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